

Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

ANN BEAHM,

Plaintiff,

v.

CITY OF BREMERTON, KITSAP
COUNTY, PAUL LUCAS, MICHAEL
MECHAM, ANGELA WOODS, PHIL
WILLIAMS, ROBERT ELSEN,
MARYELLEN BABBITT, SHEREE
JANKOWSKI, DETECTIVE RODNEY
HARKER,

Defendants.

Case No. C09-5048 RJB

STIPULATION AND ORDER TO
CONTINUE TRIAL DATE AND
DEADLINES FOR ALL OTHER
EVENTS LISTED IN THE MINUTE
ORDER SETTING TRIAL,
PRETRIAL DATES AND
ORDERING MEDIATION

STIPULATION

The parties stipulate as follows:

1. The Minute Order Setting Trial, Pretrial Dates and Ordering Mediation sets the trial date in this case for February 22, 2010 and discovery cutoff for October 26, 2009.

2. Due to the schedules of counsel, only a portion of one deposition has been taken to date. The parties anticipate taking several more depositions. Since plaintiff's counsel is in trial the month of September, the parties believe that it will not be possible to complete discovery by October 26, 2009.

1 3. In addition, counsel for Kitsap County, Ione George, and counsel for City
2 defendants, Mark Koontz, represent parties in *Williams v. Kitsap County*, United States
3 District Court, Western District of Washington, Case No. C08-5430 RBL, which has a trial
4 date of February 22, 2010.

5 4. The parties believe that in order to complete discovery and avoid trial
6 conflicts, the trial date in this case should be continued to May 2010. The parties are
7 available to begin trial on May 3, 10 or 17, 2010.

8 DATED this 23rd day of September, 2009.

9
10 ROGER A. LUBOVICH
11 Bremerton City Attorney

 LAW OFFICE OF CLAYTON
 LONGACRE

12 By: /s/ Mark E. Koontz
13 Mark E. Koontz, WSBA #26212
14 Attorney for City Defendants

 By: /s/ Clayton E. Longacre
 Clayton E. Longacre, WSBA #21821
 Attorney for Plaintiff

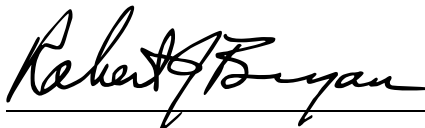
15 RUSSELL HAUGE
16 Kitsap County Prosecuting Attorney

17 By: /s/ Ione S. George
18 Ione S. George, WSBA #18236
19 Attorney for Defendant Kitsap County

20 **ORDER**

21 Based on the above stipulation of the parties, It Is Ordered that the trial date be
22 continued to May 10, 2010 and that all other events listed in the Minute Order Setting
23 Trial, Pretrial Dates and Ordering Mediation be continued to correspond to the new trial
24 date.

25 ENTERED this 30th day of September, 2009.

26 

 HONORABLE ROBERT J. BRYAN
 United States District Court Judge

1 Presented by:
2

3 ROGER A. LUBOVICH
4 Bremerton City Attorney

LAW OFFICE OF CLAYTON
LONGACRE

5 By: /s/ Mark E. Koontz
6 Mark E. Koontz, WSBA #26212
7 Attorney for City Defendants

By: /s/ Clayton E. Longacre
Clayton E. Longacre, WSBA #21821
Attorney for Plaintiff

8 RUSSELL HAUGE
9 Kitsap County Prosecuting Attorney

10 By: /s/ Ione S. George
11 Ione S. George, WSBA #18236
12 Attorney for Defendant Kitsap County
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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2009, I electronically filed the STIPULATION AND ORDER TO CONTINUE TRIAL DATE AND DEADLINES FOR ALL OTHER EVENTS LISTED IN THE MINUTE ORDER SETTING TRIAL, PRETRIAL DATES AND ORDERING MEDIATION with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Clayton E. Longacre, counsel for plaintiff and Ione S. George, counsel for Kitsap County.

Dated this 23rd day of September, 2009.

ROGER A. LUBOVICH
Bremerton City Attorney

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